



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050208

FACILITY ID No.: 069-00001

AQCR: 062

CLASS: A

SIC: 2812

ZONE: 11

UTM COORDINATE (km): 501.9, 5141.3

1. PERMITTEE

Potlatch Forest Products Corporation, Pulp and Paperboard Division

2. PROJECT

Package Boilers

3. MAILING ADDRESS

P.O. Box 1126

CITY

Lewiston

STATE

ID

ZIP

83501-1126

4. FACILITY CONTACT

Sue Somers

TITLE

Environmental Engineering Manager

TELEPHONE

(208) 799-4104

5. RESPONSIBLE OFFICIAL

Frank Radle

TITLE

Plant Manager

TELEPHONE

(208) 799-1561

6. EXACT PLANT LOCATION

803 Mill Road, Lewiston, Idaho

COUNTY

Nez Perce

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Pulp and paperboard manufacturing

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: Proposed

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. PERMIT TO CONSTRUCT SCOPE.....	4
2. TWO PACKAGE BOILERS	5
3. PERMIT TO CONSTRUCT GENERAL PROVISIONS	10

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu/hr	million British thermal units per hour
MMscf	million standard cubic feet
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
psig	pounds per square inch
PTC	permit to construct
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050208

Permittee:	Potlatch Forest Products	Facility ID No.: 069-00001	Date Issued:	Proposed
Location:	Lewiston			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

- 1.1 The purpose of this permit to construct (PTC) is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho for the replacement of Power Boilers No. 2 and No. 3 with two Package Boilers.

Regulated Sources

- 1.2 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	<u>Two Package Boilers</u> Maximum Heat Input: One boiler shall be less than or equal to 269 MMBtu/hr and the other boiler shall be less than or equal to 336 MMBtu/hr Fuels: Natural gas	none

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050208

Permittee:	Potlatch Forest Products	Facility ID No.: 069-00001	Date Issued:	Proposed
Location:	Lewiston			

2. TWO PACKAGE BOILERS

2.1 Process Description

The two Package Boilers produce steam for production operations at the Potlatch facility in Lewiston.

2.2 Emissions Control Description

Table 2.1 EMISSIONS UNIT DESCRIPTIONS

Emissions Unit(s) / Process(es)	Emissions Control Device
Package Boiler with a rated heat input capacity less than or equal to 269 MMBtu/hr	none
Package Boiler with a rated heat input capacity less than or equal to 336 MMBtu/hr	none

Emissions Limits

2.3 Opacity Limit

Emissions from the stacks of each Package Boiler shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

2.4 PM - Fuel Burning Equipment

The permittee shall not discharge to the atmosphere from any gaseous fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume in accordance with IDAPA 58.01.01.676-677.

[IDAPA 58.01.01.676-677, 4/5/00]

2.5 NSPS Requirements - Package Boilers

For each Package Boiler, the permittee shall comply with the emission standards and other requirements under 40 CFR Part 60 Subpart A and Subpart D, Db or Dc if the boiler is an affected facility under the Subpart. The permittee shall submit all required notifications to EPA Region 10 at the address given below. Copies of all information required to be submitted to the EPA for applicable NSPS requirements shall also be submitted to DEQ.

EPA Region 10
Director, Air and Waste Management Division
1200 Sixth Ave.
Seattle, WA 98101

[40 CFR 60 Subparts D, Db, Dc]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050208				
Permittee:	Potlatch Forest Products	Facility ID No.: 069-00001	Date Issued:	Proposed
Location:	Lewiston			

2.6 NESHAP Requirements - Package Boilers

For each Package Boiler, the permittee shall comply with the emission standards and other requirements under 40 CFR Part 63 Subparts A and DDDDD if the boiler is an affected source under the Subpart. The permittee shall submit an Initial Notification to DEQ in accordance with 40 CFR 63.7545. Copies shall also be submitted to EPA Region 10 at the address given below.

EPA Region 10
Director, Office of Air Quality
1200 Sixth Ave. (OAQ-107)
Seattle, WA 98101

[IDAPA 58.01.01.591, 5/1/94; 40 CFR 63 Subpart DDDDD]

Operating Requirements

2.7 Boiler Replacements

2.7.1 The permittee shall permanently discontinue operation of Power Boiler No. 2 and Power Boiler No. 3 on or before the date any Package Boiler begins operation at the facility. If Power Boiler No. 2 and Power Boiler No. 3 are proposed to be brought back into operation, they shall be considered new emissions units and shall be subject to permitting in accordance with IDAPA 58.01.01.200.

2.7.2 The permittee may replace the power boilers multiple times provided each replacement is in compliance with the requirements of this permit and:

The replacement boiler projects do not exceed a significant emission increase as determined by the methods specified by 40 CFR 52.21(a)(2)(iv)(c) and;

The permittee complies with the notification requirements of Permit Condition 2.13.

[IDAPA 58.01.01.205, 5/1/94; 40 CFR 52.21(a)(2)(iv) and 52.21(b)(33)]

2.8 Maximum Heat Input Capacity of the Two Package Boilers

The rated heat input capacity of one of the Package Boilers shall be less than or equal to 269 MMBtu/hr. The rated heat input capacity of the other Package Boiler shall be less than or equal to 336 MMBtu/hr.

[IDAPA 58.01.01.205, 5/1/94; 40 CFR 52.21(a)(2)(iv) and 52.21(b)(33)]

2.9 Fuel Types

Each Package Boiler shall be fired with natural gas exclusively.

[IDAPA 58.01.01.211.01, 5/1/94]

2.10 Package Boiler Stack Height

The exhaust stack height of each Package Boiler shall not be less than 77 feet above ground level.

[IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050208				
Permittee:	Potlatch Forest Products	Facility ID No.: 069-00001	Date Issued:	Proposed
Location:	Lewiston			

Monitoring and Recordkeeping Requirements

2.11 NO_x and CO Performance Tests - Package Boilers

For each Package Boiler, within 60 days of achieving the maximum production rate of the boiler, but not later than 180 days after initial startup of the boiler, the permittee shall conduct a performance test to measure NO_x and CO emissions from the boiler stack. The tests shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Methods 7 and 10, or a DEQ-approved alternative. If the boiler is subject to 40 CFR Part 60 Subpart D, Db or Dc, the NO_x test may be conducted in accordance with the applicable method under the subpart. The initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157. Test report information from a test(s) conducted on the boiler within five years prior to installation at the facility (e.g., to meet requirements under 40 CFR Part 60) may be submitted to satisfy this permit condition; and for such tests, in order to satisfy IDAPA 58.01.01.157 only the requirements of IDAPA 58.01.01.157.02 must be met. In addition, the following information shall be recorded during each performance test run and included in the performance test report (for a test conducted prior to installing the boiler, information items below may be waived with DEQ approval):

- Manufacturer's name, model number, serial number and rated heat input capacity of the boiler;
- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- The fuel consumption shall be recorded in units of MMBtu/hr and MMscf/hr;
- Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625; and
- The measured NO_x and CO emission rate shall be reported in units of pounds per hour, pounds per MMBtu of heat input to the boiler and in units of pounds per MMscf of natural gas input to the boiler. All calculations used to convert the test results into these units shall be provided in the test report.

[IDAPA 58.01.01.211.01, 5/1/94]

2.12 NSR Projected Emissions Records

For the initial Package Boiler installation project to replace Power Boilers No. 2 and No. 3, and for each subsequent Package Boiler replacement project, the permittee shall maintain records and provide reports in accordance with IDAPA 58.01.01.205.01 [40 CFR 52.21(r)(6) and (7)]:

- 2.12.1 In accordance with 40 CFR 52.21(r)(6)(i), before beginning actual construction of the project, the owner or operator shall document and maintain a record of the following information:
- (a) A description of the project;
 - (b) Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and
 - (c) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions and the projected actual emissions.
- 2.12.2 In accordance with 40 CFR 52.21(r)(6)(iii), the owner or operator shall monitor the emissions of CO, NO_x, PM, PM₁₀, and VOC from the two Package Boilers; and calculate and maintain a record of the annual

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050208

Permittee:	Potlatch Forest Products	Facility ID No.: 069-00001	Date Issued:	Proposed
Location:	Lewiston			

emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the change.

These records shall include but not be limited to calculations of emissions based on performance tests in accordance with IDAPA 58.01.01.211.01.

- 2.12.3 In accordance with 40 CFR 52.21(r)(6)(v), the owner or operator shall submit a report to DEQ and the EPA Administrator if the annual emissions, in tons per year, from the project identified under Permit Condition 2.12.1, exceed the baseline actual emissions (as documented and maintained pursuant to Permit Condition 2.12.1(c)), by a significant amount (as defined in 40 CFR 52.21(b)(23)) for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to Permit Condition 2.12.1(c). Such report shall be submitted to DEQ and the EPA Administrator within 60 days after the end of such year.

For the initial Package Boiler installation project to replace Power Boilers No. 2 and No. 3, the information in Table 2.2 shall be used for purposes of complying with this requirement:

**Table 2.2 40 CFR 52.21(r)(6)(v) INFORMATION FOR THE INITIAL
PACKAGE BOILER PROJECT**

TYPE OF EMISSIONS	NO_x (TPY)	CO (TPY)
Baseline Actual Emissions (BAE)	446	93.6
Significant defined by 52.21(b)(23)	40	100
Annual emission rate that would exceed BAE by a significant amount	486	194
Preconstruction projection	132	96.7

- 2.12.4 In accordance with 40 CFR 52.21(r)(6)(v), the report shall contain the following:
- (a) The name, address and telephone number of the major stationary source;
 - (b) The annual emissions as calculated pursuant to Permit Condition 2.12.2; and
 - (c) Any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).
- 2.12.5 In accordance with 40 CFR 52.21(r)(7), the owner or operator of the source shall make the information required to be documented and maintained pursuant to Permit Conditions 2.12.1 through 2.12.4 available for review upon request for inspection by DEQ, the EPA Administrator or the general public pursuant to the requirements contained in 40 CFR 70.4(b)(3)(viii). The most recent five years' compilation of data shall be kept on site for this purpose.

[IDAPA 58.01.01.211.01, 205, 5/1/94; 40 CFR 52.21(r)(6) and (7)]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050208				
Permittee:	Potlatch Forest Products	Facility ID No.: 069-00001	Date Issued:	Proposed
Location:	Lewiston			

Reporting Requirements

2.13 Notifications - Package Boilers

- Within 60 days after commencing operation of each Package Boiler, including the initial installation and each subsequent installation, the permittee shall submit the following information to DEQ in accordance with IDAPA 58.01.01.211.01:
 - manufacturer and model number
 - date of manufacture
 - maximum heat input capacity in MMBtu/hr
 - a determination showing whether or not requirements under 40 CFR Part 60 and/or Part 63 apply to the boiler
- For each Package Boiler replacement project conducted after the initial Package Boiler installation project to replace Power Boilers No. 2 and No. 3, submit a copy of the records prepared in accordance with Permit Condition 2.12.1, and a copy of Table 2.2 which is revised to correspond to the project.

[IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050208				
Permittee:	Potlatch Forest Products	Facility ID No.: 069-00001	Date Issued:	Proposed
Location:	Lewiston			

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. For each Package Boiler, the permittee shall furnish the DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
 - A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of completion/cessation of construction, within five working days after occurrence;
 - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
 - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
 - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050208

Permittee:	Potlatch Forest Products	Facility ID No.: 069-00001	Date Issued:	Proposed
Location:	Lewiston			

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.